

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

DANIEL 'LA DEERING,

Plaintiff,

v.

LOCKHEED MARTIN CORPORATION,  
et al.,

Defendants.

Case No.: 0:20-cv-01534-DSD-BRT

**PLAINTIFF'S SUPPLEMENTAL  
RULE 26(a)(1) DISCLOSURES  
(AMENDED III)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff above-named offers the following Supplemental Disclosure regarding her wage loss damages. These disclosures are based on the information reasonably available to Plaintiff at this time and are made without waiving any objections. Plaintiff reserves the right to revise, correct, supplement, or clarify the disclosures at any time, consistent with Rule 26(e) of the Federal Rules of Civil Procedure, as additional information becomes known.

**I. Damages for Loss of Compensation**

In 2018, her last year of employment with Lockheed Martin, Ms. Deering earned \$510,680. Her lost earnings per year to date (calculated as the difference between what she actually earned and what she would have earned at Lockheed (assuming increases of 5% per year)) offset by her income from employment following her termination, is as follows:



<b>Year</b>	<b>Actual Income</b>	<b>LM Est.</b>	<b>[Difference]</b>
2019	\$39,000	546,250	[507,250]
2020	\$230,0600	563,000	[332,940]
2021	\$196,281	591,000	[394,719]
2022	\$260,866	620,000	[359,134]
2023 (projected)	\$303,500	652,000	[348,500]
2024 (projected)	\$318,500	684,500	[366,000]
2025 (projected)	\$334,500	\$718,000	[383,500]
2026 (projected)	\$351,300	\$755,000	[403,700]
<b>Subtotal:</b>			<b>[\$3,095,743]</b>

In addition to the wage loss damages, Ms. Deering lost her health insurance, long term and short-term disability insurance, and her employer 401k match.

At trial, Ms. Deering will seek treble damages. She will also seek damages for emotional distress, punitive damages, costs, attorneys' fees, prejudgment interest, and any other damages available under the law.

Dated: May 25, 2023

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